









# Planning guide for secondary schools

NEU/GMB/Unison/Unite Commentary and checklist





This joint commentary and checklist follows the expected structure of the DfE Planning Guide for Secondary Schools and will assist reps in secondary schools in challenging what is being unrealistically expected of school leaders. At the time of writing the publication of the DfE **Planning Guide for Secondary Schools has** been delayed but given the urgency the joint unions are publishing this joint commentary and checklist so that that union reps can begin to work closely with unions, staff and parents when developing their plans for extended opening when it is safe to do so. Regardless of the DfE approach, it sets out stringent standards which need to be met. If the final DfE guide is substantially different from what we expect, further guidance will follow.

We are aware that the vast majority of head teachers and principals share our concerns about the rush to expand opening on this scale. Our intention is not to make life more difficult but rather to provide material which will assist in putting forward arguments to local authorities, trusts and governing bodies about why these plans are premature.

This checklist is based on current Government and public advice and is intended to help ensure that employers meet their duties to assess risks and take steps to remove or control them. As the science develops, it will be kept under review and may be revised.

Much of the advice in the draft DFE Planning Guide for Secondary Schools and this checklist is also applicable to sixth form and FE colleges. The DFE has not issued its own guidance specifically for colleges. We will seek to issue further advice for colleges but we recommend that reps in colleges use this guidance now as appropriate.

We have major concerns about the draft Department for Education (DfE) Planning Guide for Secondary Schools which is aimed at helping head teachers and principals to prepare for wider reopening of their school.

The draft DfE Planning Guide sets out that: "From 1 June we expect that secondary schools will be able to offer some face to face contact. This is not intended to be for all year 10 and 12 pupils. It will not be a return to full timetables

and pupils will not be back in school or college full time. It is intended to offer support to those pupils who need it most in order to supplement their remote education."

Implementing the steps as suggested is likely to be a huge and wholly unrealistic task for school and college leaders, who are under massive pressure, and impossible to accomplish in a way which will reassure staff that their health and safety, and that of the students, will be protected.

Current proposals to expand secondary school opening from 1 June present an unacceptable risk. School staff will not be protected by social distancing rules nor, in most cases, will they be offered any personal protective equipment (PPE). This applies even more in colleges where the DfE expects a greater proportion of students to return.

Given that the science does not yet show that children do not transmit the virus, we believe that schools should operate in the same way as other workplaces and maintain social distancing in classrooms and in movement around the school.

This means that leaders must determine the numbers of students they admit according to maintaining social distancing of 2 metres between students, between staff, and between students and staff. The number of students in each class must be calculated accordingly. In most classrooms this will mean fewer than 15 students present at one time. It is for school leaders to make this decision, to keep their staff, their students, their families and their communities, safe.

The Government needs to step back from 1 June and work with the education unions to create the conditions for a safe return based on the principles and tests set out below:

- Safety and welfare of students and staff as the paramount principle.
- No increase in student numbers until full rollout of a national test and trace scheme.
- A national Covid-19 education taskforce with Government, unions and education stakeholders to agree statutory guidance for safe reopening of schools and colleges.

- Consideration of the specific needs of vulnerable students and families facing economic disadvantage.
- Additional resources for enhanced cleaning, PPE and risk assessments.
- Local autonomy to close schools and colleges where testing indicates clusters of new Covid-19 cases.

Questions for reps to ask are suggested. If satisfactory answers are not forthcoming in all areas, then it will not be feasible or safe to extend opening until concerns are met. There is a checklist of these questions on the next page for you to use – but please read all the supplementary advice and questions in the rest of the document before you decide whether to answer Yes or No to each of them.

# What the DfE says about the role of local authorities and trusts in respect of extended opening

The draft document sets out that head teachers should confirm their extended opening plans with relevant bodies (the local authority (LA) or trust), particularly their risk assessment, and consult with mayoral offices where relevant. It is also important to consult with the governing body which in some cases may be the employer, especially in the post-16 sector.

## Our advice to reps

This is the wrong way round and not acceptable. The starting point should be that the LA or trust, or college governing body, as employer, provides a union-agreed risk assessment template and training for leaders on how to adapt it to the circumstances of the individual school or college.

Health and safety reps have the legal right to be consulted on the risk assessment and future amendments. Also required is a reporting system to be in place to allow staff to urgently alert school and college leaders to any shortcomings in arrangements or where systems aren't functioning as they should be.

Also note that every school is unique and, whilst there will be many common features, each will need to consider any additional relevant risk factors beyond what is set out in this joint commentary and checklist. This will include when a high incidence of infections develops in a particular area.



# Summary of checklist questions for reps to answer

#### **Overall**

# Have you been consulted on the risk assessment for extended re-opening of your school?

Are you satisfied that it addresses all key issues?





# Step 1 Deciding your priorities

#### How effective is the remote provision?

Are the students who would most benefit from additional face to face contact the ones who have been invited to attend?





# Where possible students should not work outside of their allocated group

Are you satisfied that hygiene and social distancing arrangements will not be compromised by students moving between groups or the size of groups?





# Which staff are best placed to support these group of students?

Will the needs of staff be considered as well as the needs of students?





# How often might students need to be in school to benefit from this additional support?

Have staff who know students best been consulted?





## Step 2

## **Practical steps to reduce risk**

Are you satisfied that these issues have been resolved to your satisfaction in time for the start of extended opening?





## Step 3

# **Reviewing staff for availability in school**

Are you satisfied that safe staffing levels will be in place from when the school starts to open more widely?





## Step 4

## Preparing the site

## Health and safety check of the building

Are you satisfied that these checks will be complied with in time for extended opening?





## Cleaning and hygiene

Are you satisfied with the cleaning and hygiene arrangements that will operate from when extended opening begins?



# Movement around the school to reduce contact

Are you satisfied that staff and students will be able to move safely through the corridors and up and down stairs from the date when the school/college re-opens more widely?



## Step 5

# External support for SEND and behaviour

Are you satisfied that these issues have been considered and that measures covering these areas will be in place in time for extended opening?



## Step 6

# Changes to routine for staff and students

Are you satisfied that these issues have been adequately addressed before extended opening begins?



#### Step 7

## **Communicating with staff**

Are you satisfied that this issue has been adequately addressed before extended opening begins?



## Step 8

## **Communicating with parents**

Are you satisfied that parents are aware of what is expected of them?



## Step 9

# Managing student and staff wellbeing and mental health

Are you satisfied that appropriate measures will be in place when the school begins to open more widely?



# **Questions for reps to ask**

# **Step 1 Deciding your priorities**

## How effective is your remote provision?

#### Questions for reps to ask:

- Does what is proposed include SEND students who would usually have additional support in a school setting?
- Some students may be in the high risk category, or may live with people in the high risk category, and so may need to continue to shield at home – is this being taken into account when considering who is best placed to come in?
- Is it clear that this is not a return to the normal curriculum?

# Where possible students should not work outside of their allocated group

#### Questions for reps to ask

- How many students can each individual classroom safely accommodate to ensure that they and staff remain 2 metres apart on entry and departure and during the day? This needs to take account of the additional staff numbers in classes with SEND students who have individual adult support. How many people altogether will be in the classroom should be the measure.
- Where is the evidence, other than what is set out in the 'protective measures guidance' that groups sizes of 15 are safe? Class sizes of 15 are wholly unacceptable as they do not permit social distancing. The joint unions' position is that staff cannot be expected to safely supervise 15 students and ensure that they socially distance.

- In particular, how will group sizes for SEND students be decided?
- How will students' emotional health and wellbeing be considered within these groups?

# Which staff are best placed to support these groups of students

#### Questions for reps to ask

- How will the health of staff and those they live with be taken into account including those who may be pregnant or vulnerable, or may live with someone, in a high-risk category and so should continue to shield at home?
- How will the needs of staff with childcare or other caring needs, be taken into account?

# How often might students need to be in school to benefit from this additional support?

Questions for reps to ask

- Have the views of staff who know their students best been taken on board?
- The draft DfE Planning Guide highlights that it may be concluded that no additional support is needed – has this been carefully considered as an option?

Are you satisfied that these areas have been satisfactorily addressed?





# **Practical steps to reduce risk**

# Schools are advised to seek to limit the numbers of students in school at any one time

The draft DfE Planning Guide sets out the need to put in place protective measures to reduce risks.

#### Questions for reps to ask:

- How does the school propose to ensure social distancing at the start and end of each school day?
- If it is planned to undertake temperature checks, how will this be managed safely in terms of social distancing between the student and member of staff to avoid queues building up?
- What measures are in place to protect staff and students who may at times need to use physical interventions (in AP and mainstream) to protect students from harming themselves or others? (They will clearly not be able to socially distance when doing this)
- In AP what measures are in place to ensure that enough appropriately trained staff are on site to support students with behavioural issues to keep safe? How and what PPE will be used in this situation?
- Is it practical to stagger arrival times, if so how?
- How will parents be informed and the system monitored?
- Is there sufficient staffing to monitor the safe arrival and departure of students at varying times?
- How will overcrowding at the school gates or in the playground be prevented?

- Will parents/carers be instructed that they may not enter the premises other than in an emergency situation?
- Will there be clear guidelines on entry to school/college about the procedures in place for essential visitors to the school?
- Will there be social distancing measures in place for visitors to the school/college?
- Will visitors working closely with students be offered PPE where necessary?
- How will other unauthorised visitors be kept away?
- Are office staff trained in revised safe working arrangements and are they satisfied that their working environment is safe? Have screens been fitted to protect them where necessary?
- Will enough staff be available at the beginning of the day (and able to socially distance) to assist students in coming into school where needed (students with SEND/ anxiety etc)?
- How will break times operate to ensure social distancing?
- What will happen in wet weather at break and lunchtimes?
- What arrangements are in place to ensure that meals can be safely prepared and served?
- How many separate lunch sittings will be needed to ensure social distancing and is sufficient staffing in place to manage this, even where someone may be absent?

- Have students been told to bring water bottles?
- How will breaks for staff operate?
- Have assemblies and the coming together of other large groups, both staff and students, been suspended
- Have off site visits been suspended?
- What are the plans for ensuring that staff can travel safely to and from school?
- For those who have no car and cannot walk or cycle, how can they safely travel to school, when use of public transport is discouraged? (note car sharing other than between members of the same household should not happen). A safe travel plan for each individual member of staff needs to be agreed.
- Where school transport operates under normal circumstances, how will this operate at this time, ensuring social distancing and hygiene arrangements?

Are you satisfied that these issues have been resolved to your satisfaction in time for the start of extended opening?





# Reviewing staff for availability in school/college

The DfE draft advises that a whole staff audit takes place to ascertain who will be available to offer additional support.

#### Questions for reps to ask:

- Are you satisfied with the proposed rota arrangements?
- Have you been given an assurance that there will always be a head/deputy, first aider, Designated Safeguarding Lead (DSL), SENCO, caretaker and sufficient cleaning staff on duty at all times?
- Are you satisfied that consistency can be ensured to minimise staff movement between classes?
- Have you been given an assurance that non cleaning staff will not be expected to undertake cleaning work?
- Do additional cleaning staff need to be hired (with due consideration for DBS implications)?
- Are cleaning staff included in all staff communications so they are kept updated of developments in school including expectations for reporting absence etc and taking into account that most cleaners do not use school email? Alternative methods of effective communication must be put in place.
- Has the site been measured to ascertain what the maximum capacity is and proportion of students that can be accommodated to allow safe distancing? (This needs to adopt a cautious approach in relation to staff availability, taking into account those who must work from home because they are vulnerable or may need to self-isolate and likely future levels of absence.)

- Is it clear to all staff and parents that only healthy staff and students who are not exhibiting symptoms, and who do not need to self-isolate, may attend school/college?
- Is it clear that pregnant staff and those with underlying health conditions that make them vulnerable or who live with or care for vulnerable or shielding householding members or those over age of 70 can continue to work from home?
- Have the risks to Black staff been assessed when planning rotas? Evidence from the Office for National Statistics shows a greater impact of Covid 19 on Black communities with a disproportionate number of deaths being recorded. The DfE draft Planning Guide does not address this issue.
- Will parents be advised that the school/ college cannot guarantee to be able to keep students socially distant, with support for parents to assess the risks to themselves and other family members of sending their child to school/college?
- What arrangements are in place for safe induction of new staff during this period?
- Have catering staff been involved in discussions about how meals will be served and are there sufficient catering and lunchtime supervision staff to ensure that students can safely eat their lunch?
- Will supply teachers be brought in as necessary?
- Will senior leaders be available to cover classes if needed?
- Can an assurance be given that teaching assistants, unless it is part of their normal role such as for higher level teaching assistants, will not be expected to lead classes?

- To what extent can parents of SEND children be reassured that their child will still be working with, or have access to, their key worker/learning support assistant?
- Has account been taken of the fact that some staff, in particular support staff, normally work at close proximity to individual pupils and how this work can continue in a safe manner?
- Is there a procedure to close the school or college at short notice if staffing levels fall to levels where safety cannot be assured, and is this understood by staff, parents and students?

# **Step 4 Preparing the site**

#### Health and safety check of the building

<u>DfE guidance</u> sets out checks that need to take place for schools that have been entirely closed

#### Questions for reps to ask:

Has this document been consulted by management and confirmation given to you that each of these points will be addressed in advance of reopening for schools that have been entirely closed, and that assurances will be given in writing about the safety of the following areas?

- hot and cold water systems
- gas safety
- fire safety
- kitchen equipment
- Specialist equipment used by students (eg for access/mobility/changing)
- security including access control and intruder alarm systems
- ventilation



## **Cleaning and hygiene**

The DfE draft tells head teachers that they will want to make clear to staff and parents what their 'expectations' are about cleaning and hygiene. It suggests that they 'may wish to consider plans' for the following:

- The availability of soap and hot water in every toilet and any areas used for personal care of students eg changing (and if possible in classrooms)
- The location of hand sanitiser stations, for example at the school entrance for students and any other person passing into the school to use, and their replenishment
- The location of lidded bins in classrooms and in other key locations around the site for the disposal of tissues and any other potentially infected waste, their double bagging and emptying
- Ensuring you have a good supply of disposable tissues in each classroom and enough to top up regularly, as well as lidded bins with double bagging for disposal, with any other potentially infected waste, and where these should be located.

#### Questions for reps to ask:

Reps need assurances about the systems that the head teacher will be able to implement. Without these assurances there can be no 'expectations' on either staff or parents.

 Are you satisfied that the school is following the published <u>guidance</u> on cleaning (infection prevention and control)

- Given that social distancing is expected in all other areas of society, it is unacceptable that the Government expects schools to open without the protections that are recommended for other environments, eg shops and public transport. What is proposed to address this issue?
- Will soap and, preferably warm, water be available at all times, with systems in place to ensure continuity of supply of soap and sanitiser?
- How will the school ensure that students and staff arriving can safely queue up, at 2 metre distance from each other, to access the sanitiser on arrival?
- Will staffing levels (and PPE) allow for enough staff to support those students in special schools to do this who are unable to do it independently?
- Are lidded bins available in every classroom? Unless operated by pedal, the lids will need to be regularly sanitised throughout the day. How will this happen? Who will empty them during the day?
- What arrangements are in place to keep every classroom supplied with tissues?
- Will staff and students wash their hands for at least 20 seconds with water and soap on arrival, before departure and regularly throughout the day, including before and after every break and lunchtime, and how will this be supervised and monitored?
- Will students be regularly reminded to catch coughs and sneezes with a tissue or elbow?
- Will appropriate PPE be provided in schools/ colleges where students are unable, or less able to catch their sneezes and coughs?
- Will hand dryers be disconnected and replaced with paper towels and bins?

- Wil drinking fountains be taken out of use?
- Will only rooms with windows that can be kept open be used?
- Will doors to be kept open where possible to aid ventilation?
- Will separate risk assessments take place in classes where leaving a door open will expose students to additional risks (eg runners)?
- Will air conditioning systems not be used unless it can be confirmed that there is no additional risk?
- Will all areas of the premises be thoroughly cleaned on a daily basis with particular focus on surfaces that are touched by multiple people such as photocopiers, door handles, table/counter tops, computers including mouse and keyboard, light switches telephones, chairs, bannisters, shared learning resources, specialist equipment for SEND students, toilets and toilet handles, sinks, taps and other areas touched regularly, with additional cleaning during the day as necessary?
- Will each classroom be provided with gloves and disinfectant spray in case a student coughs or sneezes on a piece of equipment? Having these materials in each classroom will allow staff to sanitise as they see fit during the school day.
- Where there is a risk of airborne contamination, because social distancing cannot easily be adhered to, particularly where staff are at risk from spitting or biting and where students are unable to catch or control coughs and sneezes, PPE must be provided and training given on its use and disposal. Will this happen?

- Will PPE be available for emergency situations, for example when a student develops symptoms during the school day and is awaiting collection?
- What assurances can be given about secure arrangements for sourcing PPE?
- Can confirmation be given that if any member of staff wishes to wear a face covering, they will not be prevented from doing so?

Are you satisfied with the cleaning and hygiene arrangements that will operate from when extended re-opening begins?



# Movement around the school to reduce contact

The main suggestion from DfE in its draft is for corridors to be used on a one-way basis.

#### Questions for reps to ask:

- Will a one-way system be introduced? If not, why is it not needed?
- What arrangements are proposed for safe movement on staircases?
- What arrangements are in place for use of lifts – can social distancing be achieved if a staff member travels in the lift with a child?
- How will staff and students be made aware of the new arrangements, with particular reference to very young students and those with special needs?
- Who will monitor that the systems are being complied with? Will a member of staff be on duty at all times?

- Are other measures needed in corridors, for example floor markings or removal of furniture or students walking in single file?
- Is there provision for the movement of students around the school who may need additional assistance from an adult?
- How will students and staff keep 2 metres apart, even with these arrangements?
- What arrangements are proposed around access to student toilets to ensure no overcrowding during lesson and break times?
- What signage will be displayed to support these new systems?
- Are you satisfied that a review of fire evacuation procedures, including assembly points, has taken place?

Are you satisfied that staff and students will be able to move safely through the corridors and up and down stairs from the date when the school re-opens more widely?





# **External support for SEND and behaviour**

The DfE draft advises that where normal external support services may not be available from the local authority, schools/colleges should consider different arrangements and consider using alternative organisations for support.

The Coronavirus Act 2020 has temporarily (until 25th September) changed the law on EHC plans meaning that local authorities now no longer have a duty to secure educational provision in accordance with the EHC plan. Instead they now have a duty to use their 'best endeavours' to do so. This is likely to mean that there is an increased pressure on schools to fill the gap. The DfE guidance on the changes regarding EHC plans is at here.

**Conducting a SEND risk assessment** 

Supporting primary and secondary pupils' wellbeing at an academy

#### Questions for reps to ask:

- Will individual risk assessments and discussion with parents/carers have taken place and been agreed by the date when extended opening begins, to ensure that any provision required by a student in order to attend school/college is safely in place?
- Where LAs cannot, despite 'best endeavours' provide the support listed in an EHC plan can student safety in be guaranteed? Eg behaviour support.
- Will there be clear guidelines on entry about the procedures in place for essential visitors from external agencies visiting students (eg educational psychologists, CAMHS, behavioural support, advisory teachers etc)?

- Will there be social distancing measures in place for visitors from external support agencies visiting students at school/college?
- Will visitors working closely with students be offered PPE where necessary?
- If LAs cannot provide additional trauma support for students can another provider be quality assured and risk assessed in time for when the school begins to open more widely?

Are you satisfied that these issues have been considered and that measures covering these areas will be in place in time for extended opening?





# **Changes to routines for staff and students**

The DfE draft advises about the need to update the behaviour policy to reflect new routines and to ensure that both staff and students are familiar with the new arrangements.

#### Questions for reps to ask:

- Will guidance and training be provided for staff to ensure they understand, and can enforce, the new routines and support students in understanding them and are familiar with revised physical arrangements, well in advance on when wider opening begins?
- Will individual student risk assessments be in place for all students who exhibit anti-social behaviour, eg biting, before a decision is made about admitting them under the new arrangements?
- Will compassionate and proportionate behaviour policies that protect health and safety, while also supporting students who may exhibit problematic behaviours as a response to trauma they may have experienced during lockdown, be in place by the time wider opening begins?
- It will not be safe to mark students' books during this period. Will clear instruction be given that no marking should take place?
- Will staff be told to wash their hands before and after handling students' books?
- Will library books be regularly sanitised?
- Some teaching assistants will be used to working in very close proximity to individual students, so how can this work continue in a safe manner?

- Have parents been informed that they should not come into school/college other than in emergency situations?
- Have other regular visitors to the school, eg parent volunteers, been informed that they should not attend at this time?
- Do essential contractors understand how they may access the premises and what precautions are expected of them while they are on site?
- Are catering staff aware of new safe working practices?

Are you satisfied that these issues have been adequately addressed before extended opening begins?





# Step 7 Communicating with staff

The draft planning guide recommends that on-line meetings be held before reopening and that senor staff are on hand to support staff.

#### Questions for reps to ask:

- Will senior staff be visibly present around school/college during the day?
- What arrangements will be put in place to ensure regular staff feedback on arrangements?

Are you satisfied with on-going communication arrangements?



# Step 8 Communicating with parents

Head teachers are advised to communicate with parents so that they know who is eligible to attend school/college and from when and what measures will be in place to 'make the school a low-risk place for their child'.

Are you satisfied that parents are aware of what is expected of them?



# Managing student and staff wellbeing and mental health

It is recognised that school/college closure may have caused significant mental health difficulties for some students and some may have suffered a bereavement. Staff may be similarly affected.

#### Questions for reps to ask:

- What guidance will be given to staff on how to support students?
- What pastoral support services will be available?
- Does the school recognise its duties under health and safety law to protect the mental as well as physical health of staff?
- What plans are in place to ensure that this duty is applied?
- What counselling services are available for staff and students who may need support?
- How will the school/college monitor workload at this time to ensure a reasonable work/life balance for staff?

Are you satisfied that appropriate measures will be in place when the school/college begins to open more widely?





# Appendix Health and safety check

<u>DfE guidance</u> sets out checks that need to take place for schools that have been entirely closed.

#### Questions for reps to ask:

Has this document been consulted by management and confirmation given to you that each of these points will be addressed in advance of reopening for schools that have been entirely closed, and that assurances will be given in writing about the safety of the following areas?

- Hot and cold water systems
- Gas safety
- Fire safety
- Kitchen equipment
- Specialist equipment used by students (eg for access/mobility/changing)
- Security including access control and intruder alarm systems
- Ventilation

Are you satisfied that these checks will be complied with in time for extended opening?



